

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI, EASTERN DIVISION**

UNITED STATES OF AMERICA)	
)	
Plaintiff,)	Case No. 4:24-cv-729-SEP
)	
v.)	UNOPPOSED MOTION TO
)	EXTEND
ORLANDO ASKINS, THE ASKINS)	
DEVELOPMENT GROUP, LLC, and SHAW)	
HOLDING GROUP LLC,)	
)	
Defendants.)	
)	

UNOPPOSED MOTION TO EXTEND STAY OF PROCEEDINGS

The United States, on behalf of the United States Environmental Protection Agency, respectfully moves this Court to extend the stay of proceedings, Dkt. No.19 and Dkt No. 23, for a further ninety (90) days so the Parties may continue to engage in good-faith negotiations over the terms and conditions of a final settlement without diverting finite resources toward litigation.

The Parties are diligently working towards the settlement of this matter. The United States has developed and shared a draft Consent Decree with Counsel for Defendants. An additional extension of the stay will afford Defendants sufficient time to review and respond to the draft Consent Decree, and for the Parties to then make an informed decision about the probability of settlement and the need to litigate further. Agreement on a proposed Consent Decree to resolve this litigation would be subject to a public comment period and this Court's approval.

Defendants remain subject to the Stipulated Preliminary Injunction, Dkt. No. 21, ensuring public health is protected during the pendency of these negotiations. The Parties will provide updates on this matter at any time as directed by the Court.

Counsel has been consulted and Defendants do not oppose this motion. A proposed order accompanies this motion. Consistent with E.D.Mo. L.R. 4.01(A), no memorandum accompanies this motion.

Respectfully submitted,

/s/ Rachel Fullmer

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